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| 13. SUPPLEMENTARY NOTES Report totals 2440 pages | | | | | | |
| 14. ABSTRACT Development and fielding of the F-35A represents one of the priority defense programs for the U.S. The F-35 program was initiated in the early 1990s to provide the premier strike fighter aircraft to the Air Force, Marine Corps, and Navy, as well as international partners for the next several decades. Currently, the Air Force is scheduled to acquire and field over 1,700 F-35As over the next several decades; this basing action is only a part of the Air Force's program to assure availability of combat-ready pilots and maintenance personnel in the most advanced fighter aircraft in the world. This Environmental Impact Statement focuses on the analysis of alternative locations for and the Records of Decision for the Air Force's initial operational wing locations. | | | | | | |
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RESPONSES

Air Quality-AQ

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|---|---|
| AQ-1 | R0007, R0014, R0310, R0352, R0368, R0395, R0399, R0466, R0489, R0587, R0594, R0641, R0749, R0764 | Concern that F-35s will increase air pollution on and around the airport. | Section BR3.3.2.1 and BR3.3.2.2 evaluates emissions and potential impacts to air quality from F-35A operations (including taxiing, runups, idling, takeoffs, landings, and from aerospace ground equipment). The total anticipated emissions resulting from F-35-related construction and operations at each facility is set forth in the EIS. For purposes of determining whether the net change in emissions could be “environmentally significant,” the net emissions results were compared to the major source thresholds for attainment pollutants under the Clean Air Act’s (CAA’s) Prevention of Significant Deterioration (PSD) permitting program as an indicator of significance. In each case, the net emissions results were below the regulatory indicator of significance and air pollution would not be expected to increase. Within the airspace, it is anticipated that the majority (more than 95 percent) of flight operations will occur above the mixing height. As noted on pg. 3-22’s discussion of “Mixing Heights” the EPA analysis has made the determination that emissions from aircraft occurring more than 3,000 feet above ground level do not have a detectable impact on air quality and pollutant concentrations. |

Biological Resources-BR

| Response Number | Comment Number | Comment Description | Response |
|-----------------|----------------|--|---|
| BR-1 | R0711 | BR3.7.1.1 indicates CL III wetlands exist but they are actually CL II. | The text has been revised to reflect this correction. |
| BR-2 | R0711, R0489 | Commenter indicates that there are two threatened or endangered species that were not documented in BR3.8.1.1. | As stated in the text in BR3.8.1.1, these particular species are not found within Burlington AGS boundaries. This statement in the EIS is correct. |
| BR-3 | R0239 | US Department of Interior, Region 4 provided an article on Experimental Evidence for the Effects of Chronic Anthropogenic Noise on Abundance of Greater Sage-Grouse at Leks. | Thank you for the article. Specific response to noise by sage grouse is addressed in Appendix C, Section C2.6.6 (which was updated to reflect specific information associated with sage grouse). The conclusions remain that there would be no adverse or significant noise impacts. |
| BR-4 | R0480, R0518 | Scientific data to back up statements about wildlife adaptation to higher noise levels. | General noise effects were evaluated in the EIS at base-specific sections 3.6, 3.7, and 3.8. Responses to noise by wildlife and livestock (which are not location specific) are also addressed in Appendix C, Sections C2.6.4 and C2.6.5 to avoid repetition throughout each base section. No adverse or significant impacts are anticipated by noise generated by the F-35A in the airspace or at the airfields. Wildlife that have already been exposed to F-16 operations would experience no perceptible changes due to F-35A operations. |
| BR-5 | R0489 | There is a heightened potential of BASH with eagles. | Bird/wildlife aircraft strike hazards (BASH) were evaluated in BR3.4.1.2 (Safety) and in BR3.6.1.2 (Terrestrial Communities). The conclusion is that there would be no adverse impacts when compared to baseline conditions. This is supported by the fact that there would be decreases in the number of operations under both basing alternative scenarios. |
| BR-6 | R0489 | Attention must also be drawn to species in and at Lake Champlain. | The only types of potential impacts would be generated from aircraft overflights of the lake. Appendix C thoroughly addresses noise effects to wildlife and the conclusion is there would be no adverse effects caused by aircraft overflights. See Section BR3.6.2.2 for the discussion. |

Consultation/Coordination-CO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|----------------|--|--|
| CO-1 | R0058 | Our office sent a letter of "conditional concurrence" based on identifying the Area of Potential Effect (APE) and associated impacts. | The comment is correct; the text was revised in Sections Mc3.9.2 and SH3.9.2 identifying the APE in the Revised Draft EIS. Subsequently, in the Final EIS, the text in Sections Mc2.4, SH2.4, and Appendix B was revised to reflect this conditional status. |
| CO-2 | R0058 | Concurs with our previous assessment that no properties listed on or eligible to the NRHP will be affected. | The Air Force thanks the South Carolina Environmental Protection Division for its review of the EIS. |
| CO-3 | R0087 | The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites. | The Air Force thanks the Catawba Indian Nation for its review of the EIS. |
| CO-4 | R0121 | Coastal consistency determination. | The Air Force thanks the Florida Department of Environmental Protection for its review of the EIS and determination that the proposed federal activities are consistent with the Florida Coastal Management Program. |
| CO-5 | R0139 | This is not an accurate statement, as the Vermont SHPO did not verbally concur ... | Text in Section BR2.4 has been revised to reflect that the Vermont SHPO conditionally concurred in April 2013, stating that they would withhold final determination until review of the next version of the EIS. |
| CO-6 | R0139 | Concurs with Revised Draft EIS determination that there will be no adverse effects on historic resources. | The Air Force thanks the Vermont SHPO for its review of the EIS and concurrence. |
| CO-7 | R0251 | USEPA has rated the draft EIS as Lack of Objectives. | The Air Force thanks the USEPA for its review of the EIS. |
| CO-8 | R0669 | Concurs with Revised Draft EIS determination that there will be no adverse effects on historic resources. | The Air Force thanks the Florida SHPO for its review of the EIS and concurrence. |
| CO-9 | R0705 | Cover email for Winooski City Council Resolution. | The Air Force thanks the City Council. The Resolution was entered separately as R0712. |
| CO-10 | R0329, R0330 | U.S. Department of Interior Region 4 regarding the Mountain Home AFB basing alternative. | Thank you for your consideration of the Air Force action associated with Mountain Home AFB. The article has become part of the official project record and will be considered in the decision-making process. |
| CO-11 | R0810 | Oregon SHPO concurs with Air Force determination of no adverse effects | The Air Force thanks the Oregon State Historic Preservation Office for its review of the EIS and concurrence. |

Cultural Resources-CR

| Response Number | Comment Number | Comment Description | Response |
|-----------------|----------------------------|---|---|
| CR-1 | R0252, R0336, R0489 | The DEIS does not identify specific properties or the impacts on them. | Historic properties were evaluated as a whole within the Area of Potential Effect (APE) and the results are found in BR3.9.1.2. Appendix C, Section C.8 provides evaluation of noise effects on structures and Section C2.9 presents noise effects on historical and archaeological sites. As indicated in consultation correspondence in Appendix B, the Vermont SHPO concurred with the Air Force findings of no adverse effects to historic properties. |
| CR-2 | R0336, R0390, R0586, R0815 | Requests referral to the Advisory Council on Historic Preservation. | As indicated in Chapter 3, Section 3.10.1, the Air Force undertook the correct avenue for consultation per Section 106 of National Historic Preservation Act. The Vermont State Historic Preservation Office was consulted and they concurred with the Air Force finding of no adverse effects to historic properties. See Appendix B for correspondence associated with consultation efforts, the Vermont State Historic Preservation Office letter number R0139 in Appendix E, and Response CO-6. |
| CR-3 | R0806 | Utah Division of State History referred Air Force to 32 CFR 800.8 for correct NEPA consultation process | The Air Force followed the correct consultation process. It received concurrence of no adverse effects in the APE from the Utah Department of Heritage and Arts on September 24, 2012. See Appendix B for a copy of the letter. |

Environmental Justice-EJ

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|---|--|
| EJ-1 | R0008, R0135, R0198, R0274, R0298, R0310, R0319, R0352, R0359 R0365, R0368, R0394, R0399, R0466, R0587, R0594, R0749, R0759, R0764, R0777, R0780 | F-35 basing will result in the degradation and/or destruction of low-income residential neighborhoods. | Each base-specific Section 3.12.1.2 evaluates whether there is the potential for disproportionate impacts to minority or low-income populations. For example, Section BR3.12.1.1 notes that existing airfield noise (including that from commercial and civil aviation) disproportionately impacts minority and low-income persons when compared to state levels. This situation would not change under either of the basing scenarios for Burlington IAP, F-35A beddown noise impacts (BR3.12.1.2) would continue to disproportionately affect low-income and minority populations. See also response to LU-1 and LU-3. |
| EJ-2 | R0193 | The RDEIS did not follow that guidance. The adversely impacted areas by Census blocks should have been used for the analysis. | As stated in Chapter 3, Section 3.13.2: data presented have been collected from a variety of sources including U.S. Census Bureau 2010 Census, American Community Survey, Bureau of Economic Analysis, Departments of Labor, and the Air Force. For equal comparison of low-income and minority population impacts the 2006 to 2010 American Community Survey data were used. These are the only set of data that the Census Bureau now generates to obtain the level of specificity required for this analysis. The 2010 Census did not provide that level of detail. |
| EJ-3 | R0193 | Vicinity does not follow the methodology for a "study area," thus the EIS has reached erroneous conclusions | The terminology "in the vicinity of" was used to identify those <i>areas</i> affected by noise levels 65 dB DNL and greater (i.e., the study area). The affected environment or study area is well defined in Section BR3.12.1.1 and BR3.12.1.2; therefore, the conclusions of potential effect are correct. See also Response EJ-5. |
| EJ-4 | R0193 | A proper analysis needs to be done addressing the severe shortage of affordable housing. | As stated in the EIS, there would be no appreciable changes to Air Guard personnel under ANG Scenario 1 so no effects to housing availability or demand would occur. Under ANG Scenario 2, while there would be a small increase of personnel it was estimated that there would not be adverse impacts to short- or long-term trends in the regional housing market. The number of personnel added in Scenario 2 would represent less than 1 percent (266) of the county population. |
| EJ-5 | R0817 | the study area for minority and low-income populations is inappropriate in the EIS. | As Chapter 3, Section 3.13.1, the analysis of environmental justice focuses on changes in airfield noise levels affecting the base and adjacent communities created by the proposed action. A threshold of 65 dB DNL was established for environmental justice impacts. As such, areas subject to noise levels of 65 dB DNL or greater were analyzed. Therefore, the EIS just looked at minority and low-income population in those areas underlying noise contour bands 65 dB DNL and greater (i.e., the study area not the entire city). In Tables BR3.12-2, BR3.12-4, and BR3.12-5, the total, minority, and low income populations and percentages within noise contour bands are clearly defined under baseline and the two basing scenarios. |

General Opposition-GO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|---|--|---|
| GO-1 | R0001, R0002, R0004, R0006, R0010, R0011, R0013, R0014, R0015, R0017, R0019, R0021, R0026, R0027, R0028, R0036, R0037, R0038, R0039, R0040, R0041, R0042, R0043, R0044, R0045, R0052, R0053, R0056, R0059, R0060, R0061, R0062, R0063, R0064, R0069, R0075, R0076, R0079, R0080, R0081, R0083, R0084, R0086, R0089, R0092, R0093, R0094, R0095, R0096, R0097, R0101, R0102, R0103, R0104, R0106, R0107, R0108, R0109, R0114, R0117, R0122, R0123, R0124, R0126, R0128, R0130, R0132, R0133, R0134, R0140, R0141, R0144, R0147, R0149, R0160, R0164, R0165, R0166, R0169, R0172, R0177, R0185, R0190, R0191, R0192, R0200, R0201, R0204, R0205, R0206, R0209, R0214, R0219, R0222, R0226, R0227, R0229, R0232, R0235, R0236, R0239, R0240, R0241, R0242, R0243, R0244, R0245b, R0245d, R0245f, R0245h, R0245k, R0245m, R0246, R0247, R0248, R0252, R0253, R0254, R0257, R0258, R0264, R0265, R0268, R0273, R0274, R0275, R0277, R0279, R0280, R0281, R0283, R0284, R0285, R0286, R0288, R0291, R0292, R0295, R0297, R0298, R0302, R0304, R0305, R0306, R0308, R0309, R0313, R0314, R0316, R0318, R0319, R0320, R0322, R0323, R0326, R0328, R0331, R0332, R0334, R0335, R0336, R0338, R0339, R0340, R0342, R0343, R0345, R0346, R0348, R0349, R0350, R0351, R0352, R0357, R0358, R0359, R0363, R0364, R0365, R0368, R0369, R0370, R0372, R0374, R0377, R0378, R0379, R0380, R0381, R0384, R0385, R0387, R0389, R0397, R0402, R0403, R0406, R0412, R0413, R0414, R0415, R0416, R0418, R0419, R0421, R0423, R0424, R0425, R0427, R0431, R0446, R0447, R0448, R0449, R0450, R0451, R0452, R0453, R0454, R0455, R0456, R0457, R0458, R0459, R0460, R0461, R0462, R0463, R0465, R0468, R0469, R0470, R0472, R0473, R0474, R0475, R0476, R0477, R0479, R0482, R0483, R0484, R0486, R0487, R0488, R0489, R0491, R0495, R0498, R0499, R0502, R0503, R0504, R0505, R0506, R0507, R0508, R0509, R0510, R0511, R0512, R0513, R0514, R0515, R0516, R0517, R0518, R0519, R0521, R0522, R0524, R0525, R0526, R0527, R0528, R0530, R0531, R0532, R0533, R0534, R0537, R0538, R0539, R0541, R0542, R0543, R0544, R0545, R0546, R0549, R0550, R0551, R0552, R0553, R0554, R0555, R0556, R0557, R0558, R0567, R0569, R0570, R0572, R0573, R0574, R0575, R0576, R0577, R0581, R0583, R0584, R0585, R0586, R0588, R0590, R0591, R0593, R0596, R0598, R0599, R0601, R0602, R0603, R0604, R0605, R0606, R0607, R0609, R0610, R0611, R0612, R0614, R0616, R0619, R0620, R0621, R0622, R0623, R0625, R0626, R0627, R0628, R0629, R0631, R0632, R0633, R0634, R0635, R0637, R0638, R0642, R0644, R0645, R0647, R0648, R0649, R0650, R0651, R0654, R0657, R0658, R0659, R0661, R0662, R0665, R0666, R0667, R0668, R0673, R0675, R0677, R0679, R0680, R0681, R0682, R0683, R0684, R0685, R0686, R0687, R0688, R0689, R0690, R0691, R0692, R0693, R0694, R0695, R0696, R0697, R0699, R0700, R0701, R0702, R0704, R0705, R0707, R0709, R0710, R0712, R0713, R0714, R0716, R0717, R0718, R0719, R0721, R0722, R0723, R0724, R0725, R0730, R0731, R0735, R0736, R0737, R0738, R0739, R0740, R0741, R0742, R0743, R0744, R0745, R0746, R0747, R0750, R0751, R0752, R0755, R0756, R0761, R0762, R0767, R0768, R0769, R0770, R0771, R0772, R0773, R0774, R0776, R0778, R0779, R0781, R0784, R0790, R0791, R0793, R0794, R0795, R0798, R0799, R0800, R0801, R0802, R0803, R0804, R0807, R0808, R0809, R0811, R0812, R0813, R0814, R0815, R0816, R0817, R0820, R0821, R0822 | General opposition to F-35A operational basing in Burlington, VT and to the financing of the aircraft. | Your opinions relative to implementing the proposed action at Burlington IAP is noted, has become part of the official project record, and contributed to the decision-making process. In accordance with the National Environmental Policy Act, the Air Force is considering the environmental impacts of basing of F-35A operational aircraft, which includes presentation of potential impacts based on accepted scientific methodology and peer-reviewed studies, and full consideration of all comments received during the public comment periods of the EIS. |
| GO-2 | R0003, R0007, R0051, R0184 | Opposed to the very loud noise subjected to the community. | Department of Defense policy states that populations exposed to noise levels at or greater than 80 dB DNL have the greatest risk of potential hearing loss (see Appendix C, Section C2.5 for more details). Section BR3.12.1.2 notes whether there is the potential for adverse impacts to the local population. |

General Opposition-GO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|---|--|
| GO-3 | R0007, R0014, R0022, R0023, R0024, R0025, R0029, R0031, R0032, R0033, R0034, R0035, R0050, R0057, R0065, R0070, R0072, R0085, R0086, R0088, R0089, R0090, R0091, R0098, R0100, R0105, R0107, R0116, R0131, R0142, R0156, R0168, R0186, R0194, R0196, R0197, R0215, R0245a, R0245i, R0249, R0250, R0270, R0282, R0293, R0296, R0299, R0300, R0301, R0310, R0325, R0326, R0352, R0361, R0365, R0368, R0371, R0376, R0391, R0395, R0399, R0402, R0466, R0489, R0534, R0535, R0587, R0594, R0606, R0629, R0630, R0631, R0638, R0660, R0663, R0670, R0749, R0753, R0754, R0757, R0759, R0764, R0777, R0783, R0805, R0816, R0821 | Opposed to F-35A basing at Burlington International Airport for multiple reasons including the potential designation of areas "incompatible with residential use," the purchase and/or demolition of residential areas, a significant reduction in property values, loss of tourism revenue, and an overall reduction in quality of life. | The EIS quantifies areas and residential populations subject to noise levels of 65 dB DNL or greater in this manner because land use compatibility guidelines, as defined by FICUN and adopted by the DoD, indicate that residential areas subject to these noise levels would be considered incompatible unless additional noise level reduction measures were implemented. Individuals within areas designated as incompatible have an increased potential for annoyance. Section 3.11 of the EIS notes that these guidelines are not mandatory, but rather are recommendations to serve as the best means for determining noise impacts in communities near civilian and military airfields. Section BR3.11 and Appendix C, Section C2.7 of the EIS acknowledges the potential and extent of noise from the F-35A has to affect property values. For communities concerned about effects to tourism and tourism revenues, the EIS notes in Section BR3.2 and BR3.10 that average noise levels and the number of overflights would change and be noticeable in some recreation areas. Some individuals who experience this increase in noise or overflights may be annoyed and this could interfere with the quality of their recreation; however, the F-35A would be conducting activities similar to those currently conducted by the F-16. The Air Force recognizes that some individuals may feel that they have experienced a reduction in quality of life; however, impacts to quality of life are not possible to quantify, since any potential measurement would be based on a set of subjective experiences that are highly variable among individuals. The EIS does provide several indicators, such as the percentage of the population that would be highly annoyed by noise, as an estimate to predict quality of life impacts. Also see Response GP-2. |
| GO-4 | R-PCO-0001 through R-PCO-0105; R-PCOY-0001 through R-PCOY-0469 | Do not concur with basing F-35As in Burlington for various reasons. | In accordance with the National Environmental Policy Act, the Air Force is considering the environmental impacts of basing of F-35A operational aircraft, which includes full consideration of all comments provided during the public comment period of the Draft EIS. Also see Responses GO-1, GO-2 and GP-2. |
| GO-5 | R0143, R0173, R0245n, R0301, R0317, R0680, R0751 | ...protecting the public health, quality of life, and economic rights of its citizens...remove from consideration the basing of F-35 in Burlington. | Public health in terms of noise levels and safety are addressed in BR3.2.1.2 (Noise) and BR3.4.1.2 (Safety). The Air Force recognizes that some individuals may feel that they have experienced a reduction in quality of life; however, impacts to quality of life are not possible to quantify, since any potential measurement would be based on a set of subjective experiences that are highly variable among individuals. The EIS does provide several indicators, such as the percentage of the population that would be highly annoyed by noise, as an estimate to predict quality of life impacts. Environmental justice is also evaluated in terms of impacts and can be found in BR3.12.1.2. Also see Response GP-2. |
| GO-6 | R0324 | requested that videos be viewed as their form of commenting | Your opinions relative to implementing the proposed action at Burlington IAP is noted, has become part of the official project record, and contributed to the decision-making process. In accordance with the National Environmental Policy Act, the Air Force is considering the environmental impacts of basing of F-35A operational aircraft, which includes presentation of potential impacts based on accepted scientific methodology, peer-reviewed studies, and full consideration of all comments received (including viewing videos at the links the commenter provided) during the public comment periods of the EIS. |

General Process-GP

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|---|---|
| GP-1 | R0012, R0047, R0439, R0589, R0635, R0805 | Misleading information provided in the proponents petition to "Save the Guard." | First, regarding the statement that F-35As would generate sound levels similar to the F-16: please refer to Table BR3.2-1 where SEL and L _{max} noise levels are presented for F-16s and F-35s conducting similar operations within the airfield environment--in all instances the F-35 generates noise levels greater than the F-16s. Second, it states that there would be 2,613 fewer operations per year; however, this is only the case under ANG Scenario 1. Under ANG Scenario 2, there would be 803 fewer operations. Third, while it is not anticipated that there would be adverse health effects, the noise evaluation does indicate that when compared to baseline conditions both basing scenarios would affect more acres, people, and housing units that are exposed to noise levels exceeding 65 dB DNL and greater. There would also be continued disproportionate impacts to low-income and minority populations exposed to noise levels exceeding 65 dB DNL. |
| GP-2 | R0012, R0085, R0162, R0245g, R0778 | Process for accounting for comments. | The importance of comments in the NEPA process depends upon their substance, not their number. The National Environmental Policy Act (NEPA) process is not a vote, rather it is intended to help public officials make decisions that are based on an understanding of environmental consequences, and take actions that protect, restore, and enhance the environment (40 CFR 1500.1(c)). According to the Council on Environmental Quality's 40 FAQs: "if a number of comments are identical or very similar, agencies may group the comments and prepare a single answer for each group." The Air Force has taken this approach both in the comments associated with the Draft EIS and those received in response to the Revised Draft EIS. Petitions, form letters, and form-letter postcards that were the same, were evaluated as one and the issues addressed as a group. Any form letters or form-letter postcards that included additional comments were considered on their own merit and grouped accordingly. Refer to revised Section BR2.5.2 that clarifies the comments and signatures received in response to the Draft EIS and Section BR2.5.3 addressing comments received in response to the Revised Draft EIS. |
| GP-3 | R0031, R0289, R0301, R0666 | Comments on the value of having the F-35. | As a function of the National Environmental Policy Act process, the EIS evaluates and presents environmental impacts anticipated under the proposed action (e.g., basing F-35A operational aircraft at one or more bases in the U.S.) and it is not a study of national defense. Such an analysis of the aircraft's merits are not within the scope of National Environmental Policy Act |

General Process-GP

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|--|--|
| GP-4 | R0046, R0074, R0511, R0677 | The process has been undemocratic, covert, and lead by the Air Force which has a vested interest. | This EIS was done in compliance with National Environmental Policy Act, which was enacted in 1969 to assure that all branches of government give proper consideration to the environment prior to undertaking any major federal action that could significantly affect the environment. National Environmental Policy Act established the requirement that all federal agencies' major actions be made with full consideration of the impact to the natural and human environment. National Environmental Policy Act requires agencies disclose these impacts to interested parties and the general public. The central element in the environmental review process is a rigorous evaluation of alternatives including the "no action" alternative. Also, as detailed in Section 1.5, the Air Force provided substantial opportunities for public involvement and input. See also response to GP-2. |
| GP-5 | R0050, R0085, R0778, | Correcting the number of responding citizens. | Section BR2.5.2 was revised to reflect a re-counting of comments received both in support of and opposition to basing F-35As in Burlington. However, National Environmental Policy Act is not a vote but rather focuses on environmental impacts. |
| GP-6 | R0085 | Using data from the 2000 census in the first report. | The 2000 Census data were used because at the time of the first (Draft) EIS the data, at the fidelity required, were not available for Burlington, VT. The Census Bureau released the new data in phases and when the Draft EIS was published, the particular data needed to evaluate low-income and minority populations was not available. The data used in the Revised Draft EIS were derived from the now available 2010 census information. |
| GP-7 | R0085, R0245h, R0249, R0250, R0287, R0284, R0461 | Concern about how the number of comments incorrectly reported and the statement that the Air Force received a petition signed by 11,000 people in opposition to the basing action in Burlington. | A re-counting of comments received was done and text was revised in Section BR2.5.2 to reflect this corrected information. Hundreds of form letters were received both in support of and opposition to the proposal to base F-35A aircraft at Burlington International Airport. Four petitions were received, two in support and two in opposition. Each petition was counted as one comment; however, if a petition noted several issues they were identified and addressed in the response to comments. The two petitions in support were signed by 1,675 people and the two petitions in opposition were signed by 35 people. Of the 1,126 total comments received during the hearings and the 64-day public comment period, and associated with the Burlington alternative, there were: 73 percent in opposition, 25 percent in support; and 2 percent were of no opinion. See also Response GP-2 regarding responding to multiple similar comments. The Air Force did not receive any petition signed by 11,000 people during either the Draft or Revised Draft EIS process. However, as noted in GP-2 the substance of comments rather than their quantity is more important in the National Environmental Policy Act process. |

General Process-GP

| Response Number | Comment Number | Comment Description | Response |
|-----------------|---------------------------------------|--|---|
| GP-8 | R0136, R0522 | Sound levels are given but loudness is obscured ... on page BR4-21 the EIS presented peak sound levels ... unfortunately in a separate section (page 3-7) the revised draft EIS presents information about loudness. | The organization of the EIS was done according to the National Environmental Policy Act where it stresses not to be encyclopedic; it was not an effort to obscure the information. General information that is applicable to all six alternative basing locations such as modeling, methodology, and resource definitions was presented once in Chapter 3. That is why the information on loudness is presented on page 3-7--it applies anywhere regardless of the location. However, the peak noise was modeled specific to the weather, barometric pressure, airfield altitude, and how aircraft would operate at and around Burlington. |
| GP-9 | R0136 | The obscure presentation [in the EIS] allows those leaders to be in denial. | Data in the EIS were presented in a manner so as not to be encyclopedic (see Response GP-8). |
| GP-10 | R0199, R0672, R-PCS-0001 through 9665 | F-35 will create sound similar to the F-16, there will be 2,613 fewer operations per year and there will be no health effects on citizens. | The information supplied on the postcard was distributed by local Burlington interests and is not affiliated or endorsed by the Air Force. First, with regard to the statement that F-35As would generate sound levels similar to the F-16, please refer to Table BR3.2-1 where SEL and Lmax noise levels are compared for F-16s and F-35s conducting similar operations within the same airfield environment--in all instances the F-35 generates noise levels greater than the F-16s. Second, there is the statement that there would be 2,613 fewer operations per year; however, this is only the case under ANG Scenario 1. Under ANG Scenario 2, there would be 803 fewer operations. Third, while no adverse effects are anticipated, there would be noise increases under either ANG Scenario. Please refer to Section BR3.2.2.1 and BR3.2.2.2 for complete description of noise effects and Appendix C, Section C2.5.1 through C2.5.2 for noise effects to humans. |
| GP-11 | R0249, R0250, R0287 | Provide more information on agency meetings. | All agency contact is recorded and presented in Appendices A and B: Public Involvement and Consultation, respectively. |
| GP-12 | R0249, R0250, R0287 | Why was Figure 13-1 removed from the Executive Summary. | The figure was removed because rather than simplifying the results or the analysis, the Air Force determined that it caused confusion and did not add value. None of the conclusions changed as to the magnitude of impacts. |
| GP-13 | R0249, R0250, R0287 | Air Force omitted all references to the official comments sent from the South Burlington City Offices. | No comments were omitted, only the titles of specific people were not recognized. To the extent possible, this was rectified in the comment identification for the Revised Draft EIS. All comments received were recognized and addressed. |

General Process-GP

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|---|---|
| GP-14 | R-PCS-0001 through 9665 | Process for accounting for comments on the Revised Draft EIS. | According to Council of Environmental Quality's 40 Frequently Asked Questions: "if a number of comments are identical or very similar, agencies may group the comments and prepare a single answer for each group." The Air Force has taken this approach in the Revised Draft EIS comments. During the 45-day comment period, 10,349 post cards were received: 9,655 in support of and 694 in opposition to the basing action in Burlington, or 93 percent in support and 7 percent in opposition. In addition, there were 809 individual letters, emails, and notes received associated with the Burlington action. These were all scanned and substantive comments identified and responses given. Of the 809, there were 644 who stated their opposition to and 165 who were in support of the basing action in Burlington, or 80 percent in opposition and 20 percent in support. In addition, a petition in support of the basing action was received and signed by 2,460 people. As expected, many people shared the same comments and issues; therefore, post cards in support of and those in opposition to were recognized and the names noted but the over 10,300 cards were not physically printed; this also applies to the petition. All post cards and the petition with all the signatures are available upon request from the Air Force. |
| GP-15 | R0193, R0269, R0272, R0274, R0276, R0278, R0290, R0294, R0295, R0296, R0303, R0312, R0317, R0320, R0321, R0335, R0339, R0347, R0353, R0354, R0360, R0366, R0367, R0373, R0404, R0408, R0409, R0428, R0429, R0430, R0432, R0433, R0434, R0435, R0436, R0437, R0438, R0439, R0440, R0441, R0442, R0443, R0444, R0445, R0541, R0542, R0552, R0573, R0593, R0689, R0690, R0692, R0700, R0704, R0714, R0723, R0726, R0728, R0729, R0731, R0733, R0744, R0745, R0758, R0760, R0763, R0765, R0766, R0772, R0773, R0775, R0782, R0787, R0788, R0789, R0792, R0796, R0807 | extend comment period | In accordance with 32 Code of Federal Regulations (CFR) 989.19(3)(e), whereby information supplementing, improving, or modifying the analyses was incorporated into the Draft EIS, and factual and typographical corrections were made, the Air Force sought an additional public review period on the Revised Draft EIS. The complete document was available for review and downloading at the very start of the review period that commenced on Friday, May 31, 2013 with the announcement of the Revised Draft EIS availability in the Federal Register. While there is typically a 30-day review process for a revised draft (per 32 CFR 989.19(3)(e)) the Air Force opted for 45 days. At the same time as the Federal Register announcement, the entirety of the EIS (both volumes) was posted on the Air Force website and local newspaper announcements identified the website address. Once the omission was discovered, complete EISs were sent to all recipients. There was sufficient amount of time between receipt of the complete document and the end of the comment period for public review and commenting. |

General Process-GP

| Response Number | Comment Number | Comment Description | Response |
|-----------------|---|---|---|
| GP-16 | R0712 | Two members of the City of Winooski City Council stated that the City Council's May 2012 Resolution and Statement in Response to the Draft Environmental Impact Statement Issued by the United States Air Force was not addressed in the Revised Draft EIS. | This May 2012 Resolution was addressed and included responses to nine issues. Resolution M369 and can be found in Appendix E of the Revised Draft EIS at page E-1143. The Statement in Response was addressed as well, it is M370 (page 1146), Appendix E of the Revised Draft EIS. |
| GP-17 | R0277, R0301, R0310, R0352, R0365, R0368, R0395, R0399, R0466, R0587, R0594, R0749, R0764 | Substantive errors in the Draft EIS. | Errors that were identified as a result of comments on the Draft EIS were corrected and presented in the Revised Draft EIS. |
| GP-18 | R0252, R0519, R0568 | Comments associated with constitutionality of National Guard and international law regarding human shields. | Thank you for your participation in the National Environmental Policy Act process associated with the EIS for the F-35A Operational Beddown. The Air Force recognizes your concerns; however, these comments do not apply specifically to the National Environmental Policy Act process or the conclusions presented therein. |
| GP-19 | R0803 | Who is paying the postage on all of these postcards supporting the basing action in Burlington. Is it taxpayer money? | The Air Force has no information on postage costs for the noted postcards. Presumably members of the public paid for the postage. The Air Force does not have any involvement with the publication or postage associated with post cards, either in support of or in opposition to the action. |
| GP-20 | R0252 | the DEIS wrongly assumed that the purpose and need of the Air Force is the same as that of the VANG. | The EIS addresses the purpose and need for replacing the F-16s with F-35s as part of the United States Combat Air Force and Air National Guard (see Final EIS, Chapter 1, Sections 1.3 and 1.4, page 1-6). |
| GP-21 | R0252 | The Vermont Act 250 (Land Use and Development Act) process should be applied as part of the impact analysis and a source of mitigation measures. | Because this proposal is a federal action it followed regulations proscribed by the U.S. Council of Environmental Quality, the National Environmental Policy Act, and applicable other federal, state, and local laws and regulations. According to the Vermont Natural Resources Board website, the Act 250 program provides a public, quasi-judicial process for reviewing and managing the environmental, social and fiscal consequences of major subdivisions and developments in Vermont. This proposal is not a major subdivision nor constitutes a major development as defined by the Act; therefore, being vetted through the Act 250 process is not applicable. |

General Support-GS

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|---|--|
| GS-1 | R0044, R0048, R0049, R0054, R0055, R0067, R0068, R0071, R0077, R0082, R0099, R0106, R0110, R0111, R0112, R0113, R0115, R0118, R0119, R0120, R0127, R0129, R0138, R0145, R0146, R0150, R0152, R0153, R0154, R0155, R0158, R0159, R0161, R0162, R0163, R0170, R0171, R0175, R0178, R0180, R0181, R0182, R0183, R0187, R0188, R0199, R0202, R0208, R0211, R0212, R0213, R0216, R0217, R0218, R0220, R0223, R0224, R0225, R0231, R0237, R0238, R0255, R0256, R0260, R0261, R0262, R0267, R0271, R0307, R0311, R0327, R0337, R0341, R0344, R0355, R0362, R0375, R0383, R0386, R0388, R0392, R0393, R0394, R0396, R0398, R0400, R0401, R0405, R0407, R0410, R0411, R0417, R0420, R0422, R0426, R0464, R0467, R0478, R0481, R0485, R0492, R0493, R0494, R0496, R0497, R0500, R0501, R0523, R0529, R0536, R0540, R0547, R0548, R0559, R0560, R0561, R0562, R0564, R0565, R0566, R0571, R0578, R0579, R0580, R0589, R0592, R0595, R0597, R0600, R0608, R0613, R0615, R0617, R0618, R0624, R0636, R0639, R0640, R0641, R0643, R0646, R0653, R0655, R0656, R0664, R0671, R0672, R0676, R0678, R0679, R0698, R0703, R0706, R0708, R0715, R0720, R0734, R0748, R0785, R0786, R0818, R0819, R0823, R0824, R-Petition | General information in support of basing the F-35A at the Burlington AGS. | Your support for the proposed action in Burlington is noted, has become part of the official project record, and has contributed to the decision-making process. In accordance with the National Environmental Policy Act, the Air Force is considering the environmental impacts of basing of F-35A operational aircraft, which includes full consideration of all comments received during the public comment periods for the EIS. |
| GS-2 | R0073 | What is added economically to this area [Utah] ... far outweighs any so called inconvenience or noise that people may complain about. | Your support for the proposed action at Hill AFB is noted, has become part of the official project record, and has contributed to the decision-making process. In accordance with the National Environmental Policy Act, the Air Force is considering the environmental impacts of basing of F-35A operational aircraft, which includes full consideration of all comments received during the public comment periods for the EIS. |
| GS-3 | R-PCS-0001 through R-PCS-9655 | Concur with the Air Force's assessment that Vermont is the preferred location for the F-35. | Your support for the proposed action in Burlington is noted, has become part of the official project record, and has contributed to the decision-making process. In accordance with the National Environmental Policy Act, the Air Force is considering the environmental impacts of basing of F-35A operational aircraft, which includes full consideration of all comments received during the public comment periods for the EIS. |

Noise-NO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|--|--|
| NO-1 | R0003, R0249 R0250, R0252, R0287, R0382, R0480, R0613, R0677 | Noise mitigation measures at Burlington International Airport. | Mitigation measures (already employed in the F-35A noise modeling) at Burlington International Airport include flight restrictions to minimize noise impacts to the adjacent community. The Burlington AGS would continue to undertake the voluntary restrictions outlined in the Burlington Noise Compatibility Program Update (2008). The F-35As would maintain the quiet hours, keep within the specified arrival and departure routes and procedures, as well as ensure that single F-35A flights are flown out of the airport as opposed to simultaneous (or formation) takeoffs. The current limitations to C-5 and helicopter training operations would continue unchanged. |
| NO-2 | R0008, R0151, R0249, R0250, R0287, R0549, R0662, R0740 | Concerned that the afterburner was not factored into the noise zone equation. | Afterburner takeoffs were factored into the noise assessment. The F-35s at Burlington International Airport are proposed to use afterburners on only 5 percent of their takeoffs (vice the 90 percent done now by F-16s). However, the afterburner would be turned off shortly after the aircraft becomes airborne, much prior to crossing the airport fence line. Additionally, F-35 aircraft would conduct fewer operations than the F-16s. L_{max} and SEL measurements for individual aircraft at altitudes ranging from 500 feet to 10,000 feet can be found in Appendix C, Tables C-1 and C-2. |
| NO-3 | R0018, R0046, R0125, R0135, R0662, R0696, R0727, R0805 | The dangerous health effects that such loud volumes will have on residents and our most vulnerable. | Appendix C, Section C2.1 and Section C2.5.2 discusses potential noise impacts to various health issues. Section C2.4 describes noise-related sleep disturbances. In summary, there is no scientific basis for a claim that noise levels below 75 dB DNL would have potential health effects. |
| NO-4 | R0076 | Monitor F-35 noise levels at Burlington International Airport to be more accurate. | The airport has a noise monitoring program in place and could measure noise levels if the F-35A aircraft were based there; however, no F-35A aircraft have been flown at any of the proposed operational basing locations. F-35A overflight noise measurements have been conducted at Edwards AFB, California. Operations parameters used in the F-35A Operational Basing EIS were based on those noise measurements and multiple simulator test flights. In addition, the modeling was conducted using information specific to the local airfield rules and regulations. For example, each installation designates a 'pattern altitude' at which the level flight portions of runway approach operations are conducted. Noise modeling included operations on several flight tracks, which mirror flight tracks used by currently based aircraft. |
| NO-5 | R0078, R0249, R0250, R0287, R0319, R0370, R0821 | The EIS contained no reference to, or consideration of the ... Community College of Vermont, located at 1 Abenaki Way... | Section BR3.2 (Noise) was revised to reflect inclusion of the Community College of Vermont (CCV). Where applicable, CCV was added to Section BR3.2 text, figures, and tables. CCV is exposed to noise levels exceeding 60 dB DNL under baseline conditions and noise levels would increase under basing Scenarios 1 and 2. |
| NO-6 | R0094 | What will noise do to animals, pets, and livestock. | Potential noise effects on domestic animals and wildlife is presented in Appendix C, Section C2.6. |

Noise-NO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|---|---|--|
| NO-7 | R0125, R0533 | Low frequency noise levels were ignored as they associated with building damage. | As stated in Appendix C, Section C2.8, the probability of damage to structures resulting from subsonic noise is extremely low. Vibrations generated by aircraft (with similar noise level to the F-35A at low altitude) were measured at ancient Anasazi ruins, and found to be substantially below damage threshold peak velocities (Battis 1988). Vibrations caused by subsonic aircraft noise are similar in intensity to natural sources of vibration such as thunder and high winds (Sutherland 1989). Building and equipment constructed to withstand natural force loads (e.g., wind, minor seismic activity) should not be negatively affected by subsonic F 35A overflights. |
| NO-8 | R0136, R0157, R0203, R207, R0233, R0245n, R0249, R0252, R0377, R0511, R0522, R0644, R0686, R0713, R0717, R0759, R0817 | EIS fails to include more recent noise studies. | Appendix C includes the most recent peer-reviewed and accepted noise studies, Federal Interagency Committee on Noise (FICON) recognized reports, and Department of Defense Noise Working Group (DNWG) accepted methodology. There have been a number of noise studies with different results published in recent years. The results and conclusions of those studies have, however, been somewhat contradictory according to leading noise experts who have evaluated these studies for the Air Force. For example, the recent Hypertension and Exposure to Noise Near Airports (HYENA) study found correlations between hypertension and noise for daily road traffic noise, but only for nighttime aircraft noise. The FICON and DNWG methodologies employed are ones that are well supported and recognized by a consensus of the scientific community. |
| NO-9 | R0136, R0151 | Report fails to state that the 21 dB difference means that the F-35 is more than four times louder than the F-16. | The commenter is referring to information provided in Table BR3.2-1 and is correct that when calculating noise levels for both SEL and L_{max} F-35 noise levels exceed those of the F-16 and is represented as such. |
| NO-10 | R0136, R0203, R0711 | Failing to clearly state how much louder the F-35 is than the F-16, the revised draft fails to state how high the F-35 will be when it flies over residential areas ... | The EIS addresses noise levels to communities affected by noise generated Burlington International Airport under baseline conditions (i.e., F-16s) and those proposed for the F-35A. Specifically, Table BR3.2-1 provides altitudes, power settings, and speed for aircraft flying at and around the airfield. Numerous noise metrics were used to define and present noise levels (which incorporates altitude, speed, and power settings) in comparison to current aircraft and are defined and methodology presented in Chapter 3, Section 3.3. Metrics such as SEL, L_{max} , DNL, L_{dnmr} , CDNL, and sonic booms were all evaluated for areas potentially affected by noise generated by the F-35s and compared to baseline conditions. This information is found in Sections BR3.2.1.1 and BR3.2.1.2. In addition to presenting these metrics, the EIS evaluates speech interruptions, sleep disturbance, and potential for hearing loss (in both baseline conditions with current aircraft and potential impacts for the F-35A) at representative locations in South Burlington, Winooski, and Williston (see Tables BR3.2-3 through BR3.2-6 [baseline]; Tables BR3.2-9 through BR3.2-12 [ANG Scenario 1]; and Tables BR3.2-15 through BR3.2-18 [ANG Scenario 2]). Appendix C also provides a more detailed description of noise, modeling, and an overview of potential impacts. |

Noise-NO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|--|---|
| NO-11 | R0234, R0249, R0250, R0287, R0325, R0328, R0570, R0683 | Noise effects to children. | Classroom speech interference due to aircraft operations is presented in Section BR3.2.1.2 and specific information about noise effects on learning and cognitive abilities is presented in Appendix C, Section C2.5.5. In summary, there is no scientific basis for a claim that noise levels below 75 dB DNL would have potential health effects. |
| NO-12 | R0167, R0184, R0189, R0249, R0250, R0259, R0273, R0285, R0287, R0291, R0309, R0310, R0323, R0352, R0365, R0368, R0379, R0381, R0382, R0384, R0395, R0399, R0466, R0474, R0570, R0587, R0594, R0622, R0625, R0682, R0685, R0688, R0749, R0751, R0764, R0777, R0778, R0780, R0783, R0821 | It fails to report the sound level at which cognitive impairment may begin to be expected. Nor does it say the amount of impairment in reading ability and recall that children are expected to experience or say how impairment increases with exposure to noise. | Cognitive issues and effects on learning are addressed as part of the classroom noise effects in Appendix C, Section C2.5.5. |
| NO-13 | R0167, R0174, R0189, R0249, R0250, R0287, R0348, R0382, R0377, R0384, R0518, R0544, R0588, R0590, R0635, R0641, R0644, R0685, R0713, R0717, R0811, R0813, R0817, R0821, R0822 | Five of the six studies cited in the 2011 World Health Organization report, "Burden of Disease from Environmental Noise," concern aircraft noise... | The results and conclusions of those studies have been somewhat contradictory according to leading noise experts who have evaluated these studies for the Air Force. See Response to Comment NO-8. |
| NO-14 | R0167, R0189 | The Air Force does not provide a contour line below 65 dB DNL. | Standard practice for airbase noise analysis is to present DNL contours of 65 dB and higher. This is in accordance with FICON guidelines and DoD policy. It is also consistent with FAA practice for civil airports. |
| NO-15 | R0176, R0691 | Concern about the effects of F-35 noise on residents with noise sensitivities. | Health risks are presented in Appendix C, Sections C2.1 through C2.5. |
| NO-16 | R0076, R0189, R0203, R0245j, R0249, R0250, R0287, R0480, R0543, R0544, R0556, R0590 | Scientific consensus that has emerged in the last ten years means that serious adverse effects of aircraft noise occur at lower noise levels than the 75 dB DNL reported. | While some studies have claimed adverse health effects at levels below 75 dB DNL, such results are not well supported and are at odds with the consensus of studies accepted by the scientific community. |
| NO-17 | R0203 | The Air Force omits mention that the Air Force will be acting in violation of both of these standards. | As the commenter has noted, these are standards and not laws. The Air Force recognized in the EIS that there are populations exposed to noise levels exceeding 75 dB DNL under baseline conditions and that this number would increase under either ANG Scenario. |
| NO-18 | R0210 | I didn't see anywhere what the L_{\max} level is to an observer. | In Appendix C, Tables C-1 and C-2 present L_{\max} and SEL (respectively) measurements for an individual who is under the aircraft, regardless of location, when the aircraft is at 500, 1,000, 2,000, 5,000, and 10,000 feet above ground level. |

Noise-NO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|----------------------------|--|--|
| NO-19 | R0210 | Measured noise, rather than modeled noise should be used. | F-35A overflight noise measurements have been conducted at Edwards AFB, California. Operations parameters used in the F-35A Operational Basing EIS were based on those noise measurements and multiple simulator test flights. F-35A flight parameters have undergone further refinement and noise modeling was conducted using information specific to the local flying environment where applicable. For example, each installation designates a 'pattern altitude' at which the level flight portions of runway approach operations are conducted. Noise modeling included operations on several flight tracks, which mirror flight tracks used by currently based aircraft. Aircraft vary from standard or typical flight tracks because of winds, Air Traffic Control (ATC) de-conflicts with other air traffic, and other factors. |
| NO-20 | R0249, R0250, R0287 | Can we be guaranteed that the F-35A will not exceed the stated percentage of time taking off in afterburner. | The Air Force is committed to not exceeding the 5 percent noted for afterburner takeoffs. However, weather, emergency, and other contingency situations may on occasion require more or less takeoffs in afterburner. |
| NO-21 | R0249, R0250, R0287 | The Air Force underestimated the number of noise events that will be heard at academic institutions by overlooking late afternoon and evening classes. | As identified in Chapter 3, Section 3.3.3., standard speech interference was measured by the numbers of average daily indoor daytime (7:00 a.m. to 10:00 p.m.) events per hour subject to indoor maximum sound levels of at least 50 dB L _{max} at representative locations including schools and residential areas. Therefore, late afternoon and evening hours were evaluated. Classroom interference was measured, as the commenter indicates, from 8:00 a.m. to 4:00 p.m. since that is the majority of the time schooling occurs; however, the other metric, standard speech interference, provides an approximation to base estimates. In addition, the majority of the Burlington AGS flights occur during daytime and weekend hours. |
| NO-22 | R0497, R0661, R0739, R0740 | Why has the Air Force not come here to Burlington and fly the F-35s over the area. | No F-35A aircraft have been flown at any of the six proposed operational beddown locations. F-35A overflight noise measurements have been conducted at Edwards AFB, California. Operations parameters used in the F-35A Operational Basing EIS were based on those noise measurements and multiple simulator test flights. Noise modeling was conducted using information specific to the local flying environment where applicable. For example, each installation designates a 'pattern altitude' at which the level flight portions of runway approach operations are conducted. Noise modeling included operations on several flight tracks, which mirror flight tracks used by currently based aircraft. Aircraft vary from standard or typical flight tracks because of winds, Air Traffic Control (ATC) de-conflicts with other air traffic, and other factors. |

Noise-NO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|---------------------|---|---|
| NO-23 | R0490, R0590, R0822 | Use the 2006 FAA study for the noise evaluation. | As presented in BR3.2.1.1 the data used for baseline civil and commercial aircraft noise conditions were derived from the Burlington IAP Part 150 study (i.e., the 2006 FAA Study that was updated by FAA in 2008, and not the 2011 projection). For F-16 aircraft, actual 2010 operational data were used to better reflect baseline conditions. These data were combined and then used to derive baseline noise conditions and subsequently the projected noise environment as presented in Section BR3.2 (Noise). Therefore, in BR3.2 noise impacts were evaluated using a combination of the 2006 commercial/civilian operational data from the Part 150 and actual 2010 F-16 operational data. However, in Section BR3.10.1 (Land Use) the 2011 Part 150 projected noise contours were only used as a comparison of the 65 dB DNL projected F-35 noise contours; the 2011 study's projections were not used to calculate the land uses impacted by F-35 proposed operations. |
| NO-24 | R0510 | The above standard is for a worker. That does not cover children who have significantly higher sensitivity. ... The Air Force would put itself seriously in violation of the CDC and NIOSH standards. | The NIOSH document cited was a recommendation, and was never accepted. The current daily occupational noise exposure limit for 115 dBA is 15 minutes, not 28 seconds. The 115 dB noise level cited from Table BR3.2-1 is an outdoor instantaneous maximum sound level, i.e., experienced for only approximately 1/8 of a second, per overflight. |
| NO-25 | R0527 | Please explain why the SEL and Lmax are the same for afterburner assisted take off and military power takeoff? | The commenter is correct in her conclusion that there is no difference. This is due to the fact that the afterburner is only used for a small amount of time before it reaches 1,000 feet--the altitude at which the sound levels are recorded. Please refer to Appendix C, Tables C-1 and C-2 for L _{max} and SEL measurements for various aircraft (including F-35 and F-16) at 500, 1,000, 2,000, 5,000, and 10,000 feet above ground level. |
| NO-26 | R0533 | The EIS does not consider noise effects to buildings. | Noise effects to structures are addressed in Appendix C, Section C2.8 and to historic structures in C2.10. Specifically Table C-8 presents type of damage that could be expected from sonic booms to various material types. |
| NO-27 | R0711 | would like to see the F-35A profile from takeoff roll | These type of flight profiles are already factored into the noise modeling, the output of which are the noise contour bands around the airport. |

Proposed Action-PA

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|--|---|
| PA-1 | R0005, R0021, R0151, R0156, R0174, R0245c, R0249, R0250, R0287, R0293, R0310, R0319, R0333, R0348, R0352, R0359, R0365, R0368, R0376, R0384, R0395, R0399, R0461, R0466, R0470, R0471, R0480, R0518, R0543, R0550, R0587, R0594, R0661, R0675, R0681, R0749, R0764 | Location selection criteria and release of scoring procedures, including scoring matrix used to develop alternatives | Chapter 2, Section 2.2.6 explains that the Air Force identified Burlington AGS and Hill AFB as preferred alternative locations because these locations best fulfill the Air Force mission responsibilities and considering operational, technical, environmental, and other factors. Section 2.2 outlines the Identification Process, and Section 2.2.3 notes that the mission criterion was weighted more heavily than capacity, environmental, and cost criteria. |
| PA-2 | R0148, R0151 | What are the actual reasons that drives basing F-35s in Burlington? | How Burlington Air Guard Station was chosen as an alternative is fully addressed in Chapter 1, Sections 1.3 and 1.4. Also, Section 2.2 details the alternative identification process. |
| PA-3 | R0249, R0250, R0287 | Provide information on the projected lifespan of F-16s at Burlington AGS. | As stated in Chapter 2, Section 2.1.1, the Air Force would remove the current fighter aircraft as the F-35As arrive at the base. At this time, the Air Force anticipates that F-35s would start arriving at the basing locations in 2015 and continue through to 2020. |
| PA-4 | R0674 | Can the flight tracks be changed to minimize impacts to those underneath them adjacent to Hill AFB. | F-35A flight parameters will coincide with existing flight tracks because each base designates a 'pattern altitude' at which the level flight portions of runway approach operations are conducted. As the commenter notes, these flight tracks vary and are established at each base taking into account prevailing winds, local air traffic, avoidance areas, and other factors. The Air Force appreciates suggestions regarding night-time flight exercises. |
| PA-5 | R0356, R0486, R0580 | Why not reopen Plattsburgh AFB, New York? | The re-opening of a closed base (such as Plattsburgh) is not within the scope of this EIS. |

Public Involvement-PI

| Response Number | Comment Number | Comment Description | Response |
|-----------------|----------------|---|--|
| PI-1 | R0156 | Why was no environmental analysis done before external fuel tanks were added to our current fleet of F-16s in 2006? | Please contact the environmental flight office of the 158th Fighter Wing of the Burlington Air Guard Station (AGS). This action is not related to the current proposal to base F-35As at Burlington AGS. |
| PI-2 | R0158 | What happened to all of my previous letters, do they no longer count? | Your previous letters were received and listed on page E-26 of the Draft EIS, Volume II. Your comments are part of the official record and will be considered in the decision-making process. See also Response GP-2. |
| PI-3 | R0315 | The Air Force website is overwhelming for the average person. | Thank you for your critique, the Air Force will consider your suggestions for future endeavors. |
| PI-4 | R0480 | Air Force representatives were supposed to be at the public hearing to answer questions... | Air Force and Air National Guard personnel were available at all meetings. Prior to the formal hearing there was an open house held for an hour. During that time numerous Air Force and Air National Guard representatives (identified with name tags or patches) were standing at and around the displays. They were available to everyone who wanted to ask questions. The formal portion of the hearing, which was moderated, transcribed, and designed to garner specific comments on the EIS, was conducted consistent with Air Force National Environmental Policy Act regulations as promulgated in Code of Federal Regulations 989, Appendix C, A3.7. The hearing moderator allowed elected officials the opportunity to provide initial comments, they were then followed by comments from the general public. The moderator gave each individual equal time to express his or her position on the information and conclusions presented in the EIS. The moderator fielded comments from anyone who wished to provide them; however, the formal portion of the hearing was not designed as a question and answer session. All public materials had described the hearing format and it was adhered to at the three hearings in the three states associated with the Burlington AGS basing alternative. |

Safety-SA

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|--|--|
| SA-1 | R0003, R0007, R0013, R0014, R0046, R0116, R0135, R0174, R0221, R0249, R0250, R0274, R0275, R0323, R0325, R0328, R0365, R0368, R0370, R0395, R0399, R0474, R0543, R0544, R0570, R0584, R0587, R0657, R0675, R0685, R0691, R0749, R0759, R0764, R0811, R0812 | Concern about aircraft crashing. Concern about use of aircraft near densely populated residential areas. | Base-specific Sections 3.4 contain historical data on Air Force fighter aircraft accidents that are currently in service and discuss the potential for mishaps to occur in the airspace and at airfields. While specific data on the F-35A are not yet available due to its brief operational history, review and analysis of historical averages and trends of existing military jet aircraft were used to estimate the potential of a Class A mishaps involving the F-35A. The analysis approach has been used successfully in previous EISes to arrive at reasonable conclusions about aircraft safety and the potential for new aircraft (without an operational history) mishaps. |
| SA-2 | R0008, R0017, R0085, R0310, R0352, R0466, R0522, R0594, R0629, R0630, R0631, R0641, R0662, R0750, R0777, R0778, R0813, R0821 | F-35s have not been crash tested enough to adequately evaluate safety risks. | Review and analysis of historical averages and trends for military aircraft were used to estimate the potential of Class A mishaps involving the F-35A. Prior to commencing flight operations outside of a test facility, the F-35A will have undergone the Air Force's air worthiness certification process which includes extensive testing of all components and systems, including electrical and mechanical. In addition, with safety as a priority, the pilots would master all procedures in a simulator prior to flying the aircraft. |
| SA-3 | R0020 | Crash rates should be compared among commercial aircraft and F-16s. | Fighter F-16 and F-35A aircraft conduct their operations at vastly different speeds and altitudes than commercial jets, so comparing the two would not be reasonable. It would be like comparing the mishap risk of a passenger bus with that of a race car. |
| SA-4 | R0020, R0348 | Air Force should spell out the crash risk comparison. | Table 3-5 was added to the safety discussion in Chapter 3, Section 3.5.1. The table provides a comparison of annual mishap rates for F-16s and F-15s since they became operational. Through Fiscal Year 2012, the F-16 average mishap rate was 3.55 and F-15 rate was 2.38. This information was added to Chapter 3 because it is applicable to all six locations. |
| SA-5 | R0020 | A table in the EIS states that the accident rate was 869.57 for the F-22. | The note that accompanies Table 3.4-1 indicates that in the first year of operation (2002) there was one Class A mishap and the aircraft had flown only 115 hours of flight. This resulted in an abnormally high mishap rate for that one year, which is an anomaly. |

Safety-SA

| Response Number | Comment Number | Comment Description | Response |
|-----------------|-----------------------------------|---|---|
| SA-6 | R0020, R0228, R0249, R0250, R0287 | EIS should lay out clearly how much greater the F-35 crash risk is than the F-16's. | The EIS clearly lays out the potential mishap risk in the first seven paragraphs in Section BR3.4.1.2. The first sentence in this section says: The F-35A is a new aircraft and historical trends show that mishaps of all types decrease the longer an aircraft is operational as flight crews and maintenance personnel learn more about the aircraft's capabilities and limitations. |
| SA-7 | R0249, R0250, R0287 | There was no crash data for FY13. | Fiscal year 2013 was not complete at time of publication and the data are only compiled on an annual basis. The most recent mishap data for F-22s are provided in Table BR3.4-1. An additional table comparing the historical mishap rate for F-16s and F-15s was added to Chapter 3, Section 3.5, Table 3-5. |
| SA-8 | R0076, R0249, R0250, R0287, R0563 | Please provide the number of hours the F-35 will have flown upon its arrival in Burlington. | F-35 pilots will be completely schooled and trained in the aircraft's operations prior to operating them at Burlington International Airport. The exact number of hours an particular aircraft will have flown prior to its arrival varies from aircraft to aircraft and is impossible to define. |
| SA-9 | R0347, R0384, R0817 | Why are not the accident potential and clear zones (i.e., military zones) not applied at Burlington International Airport and the F-35? | The Burlington AGS jointly uses the airfield that is owned by another entity (not the Department of Defense); the predominant aircraft operating at the airport are commercial. Therefore, runway protection zones (similar to those used for military airfields) are applied at the Burlington International Airport. |

Socioeconomics-SO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|--|---|
| SO-1 | R0007, R0046, R0151, R0252, R0310, R0320, R0323, R0335, R0338, R0358, R0359, R0368, R0382, R0395, R0399, R0457, R0459, R0466, R0470, R0489, R0530, R0531, R0543, R0570, R0576, R0584, R0587, R0630, R0651, R0657, R0662, R0696, R0749, R0764, R0776, R0797, R0811, R0812, R0814, R0821 | The noise associated with the operational basing of F-35As will decrease local property values and property tax revenues. | The EIS describes noise effects on property value in Appendix C, Section C2.7 and in BR3.11.1.2. Section C2.7 cites research that indicates some correlation between aircraft noise and a decrease in property values. However, these studies note that property values are also affected to a greater degree by factors other than noise. |
| SO-2 | R0137, R0245i, R0245k, R0249, R0250, R0287, R0348, R0384, R0489, R0590, R0778, R0817, R0821, R0822 | The approach taken in the EIS to estimate homes and number of people impacted by noise is underestimated. | The approach taken in the EIS does differ from suggestions by commenters; however, the conclusion of the magnitude of effects presented in the EIS would not differ; it acknowledges that thousands of households and people would be affected by F-35A-generated noise levels of 65 dB DNL and greater. The methodology applied in the EIS (see Chapter 3, Section 3.3.5) was chosen so that all six locations were evaluated on equal standing. In this manner, the decision maker could decide based on a direct comparison. Text was added to the EIS to clarify the potential differences from taking different modeling approaches. It includes data provided in the comment. |
| SO-3 | R0179, R0285, R0320, R0325, R0348, R0474, R0480, R0797 | Potential sellers of homes in areas above 65 dB DNL will have to disclose to prospective buyers and lessees that the properties have been designated as "not suitable for residential use." Potential buyers of these properties will not qualify for federally-guaranteed loans, program assistance, subsidies, or housing insurance. | As noted in response to comments on the Draft EIS, the land use compatibility guidelines by Federal Interagency Committee on Urban Noise (FICUN) are used to determine potential noise impacts on land use. The Air Force does not have the authority to change community land uses or to deem properties as "not suitable for residential use." HUD, FHA, and VA mortgage policies generally prohibit guaranteeing mortgage loans for new homes located within noise zones of 75 dB DNL or greater or within clear zones. These same mortgage policies make availability of federally guaranteed mortgage loans discretionary for new homes located within noise zones of 65 to 75 dB DNL. The term "new home" includes new construction, existing homes that are less than one year old, and existing homes that have been substantially remodeled. HUD, FHA, or VA mortgage policies may also impose conditions on mortgage loan guarantees (such as written acknowledgement of noise conditions) for existing homes located in the 75 dB DNL or greater noise zone or within clear zones. |
| SO-4 | R0245e, R0245n, R0384, R0480 | Compensating homeowners. | While Congress has given the FAA authority to spend taxpayer money for mitigating noise at private residences and noise-sensitive receptors in relation to airport construction or expansion, it has not given the military Services any similar general authority. |

Socioeconomics-SO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|-----------------------------------|--|--|
| SO-5 | R0246 | There are no estimates on how many Vermonters would be employed. | Personnel estimates can be found in Section BR3.11.1.2. Under ANG Scenario 1 there would be no changes in the current levels of personnel employed at the AGS; however, under ANG Scenario 2 there would be an increase by 83 full-time and 183 part-time traditional guardsmen. As stated: Traditional guardsmen generally hold full-time jobs outside the ANG and train at least one weekend per month and two additional weeks per year with the ANG. It is expected that any increase in staffing would be met primarily through local recruitment, particularly for part-time traditional guardsmen. |
| SO-6 | R0249, R0250, R0287 | Provide information on whether any Vermont AGS members will lose their jobs. | According to Section BR3.11.1.2, no jobs would be lost with the basing of the F-35 in Burlington. |
| SO-7 | R0249, R0250, R0287, R0328, R0527 | Will the Air Force consider financially assisting the locally affected municipalities? | The Air Force has no plans to acquire residences as part of the F-35A beddown. Section BR3.10 of the EIS discloses locations in which residential land use would be considered incompatible with baseline and projected F-35A noise levels of 65 dB DNL or greater (also see Section C1.3.2 of Appendix C). Local governments have the authority to regulate land use and approve development permits in the vicinity of the airfields. The Air National Guard and Burlington International Airport works with local entities to identify potential encroachment issues and promote compatible uses to the extent feasible, taking into consideration military mission requirements. |
| SO-8 | R0249, R0250, R0287 | The Air Force is looking at the wrong census data. | As presented in Chapter 3, Section 3.12.2, data presented were collected from a variety of sources including U.S. Census Bureau 2010 Census, Bureau of Economic Analysis, Departments of Labor, and the Air Force. Results are presented for the most recent year where comparable data were available throughout the affected environment. See also response to SO-2. |

Socioeconomics-SO

| Response Number | Comment Number | Comment Description | Response |
|-----------------|--|--|--|
| SO-9 | R0328, R0544, R0622, R0625, R0629, R0630, R0635, R0638, R0641, R0651, R0657, R0659, R0662, R0677, R0685, R0756, R0759, R0811, R0812, R0821 | Designated as "unsuitable for residential use." | Only the communities' zoning commissions have the authority to deem residential land use as incompatible. The EIS quantifies the residential population and acres subject to noise levels of 65 dB DNL or greater. Chapter 3, Section 3.11 describes noise levels and land use compatibility as defined by the Federal Interagency Committee on Urban Noise (FICUN) and adopted by the Department of Defense. The section notes that these guidelines are recommendations only and not mandatory; they are provided to the community as the best means for determining noise impacts associated with commercial and military airfields. Section BR3.10 provides the change in acreages within the 65 dB DNL noise levels in which residential land use is determined incompatible by the FICUN guidelines unless structural noise attenuation measures are incorporated. The FAA land use compatibility guidelines within noise zones can be found in Table C-5. |
| SO-10 | R0503, R0630, R0778 | All good-paying jobs, like maintainers, will likely be outsourced. | The routine maintenance jobs that are currently done for the F-16s at Burlington AGS would not be lost. The F-35A aircraft would be maintained in the same manner as F-16s are currently. |
| SO-11 | R0527 | Where does the Burlington AGS rank related to cost criteria? | As reported in the EIS, the least costly construction would be associated with Jacksonville AGS, followed by McEntire JNGB, and then Burlington AGS. |
| SO-12 | R0652 | Erroneously used 2000 census data. | The 2000 Census data were used because at the time of the first (Draft) EIS the data, at the fidelity required, were not available for Burlington, VT. The Census Bureau released the new data in phases and when the Draft EIS was published, the particular data needed to evaluate low-income and minority populations was not available. The data used in the Revised Draft EIS were derived from the now available 2010 census information. |

South Burlington City Council (2-Members)-SB

| Response Number | Comment Number | Comment Description | Response |
|------------------|-----------------------------------|---|---|
| SB1-1 (Bullet 1) | R0249, R0250, R0287 | What further recourse has the area to challenge continued basing? | This comment exceeds the scope and intent of the EIS. Such decisions are in the purview of the commentors. |
| SB1-2 (Bullet 2) | R0249, R0250, R0287 | How many residential areas are subject to 80 dB DNL and higher? | The number of households (i.e., residents) are identified in Table BR3.2-2 (baseline) and in Tables BR3.2-8 (ANG Scenario 1) and BR3.2-14 (ANG Scenario 2). |
| SB1-3 (Bullet 3) | R0249, R0250, R0287 | Was analysis of possible additional pollutants conducted? | All federally-regulated and applicable emissions associated with basing the F-35 were calculated and effects presented in Section BR3.3.1 and BR3.3.2. No other emissions were appropriate for analysis. |
| SB1-4 (Bullet 4) | R0249, R0250, R0287 | When will another air quality analysis be done? | Specific air quality analysis associated with the EIS are complete. The airport may have local and/or state permitting processes that could require additional emissions analyses; however, these are outside the purview of this National Environmental Policy Act analysis. |
| SB1-5 (Bullet 5) | R0249, R0250, R0287 | Current safety status of F-22 and F-35. | The most recent mishap data for F-22s (i.e., through FY12) are provided in Table BR3.4-1. An additional table comparing the historical mishap rate for F-16s and F-15s was added to Chapter 3, Section 3.5, Table 3-5. Fiscal year 2013 (FY13) data are not available since these data are only collected on an annual basis. |
| SB1-6 (Bullet 6) | R0249, R0250, R0287 | Risk to people living in crash zones. | The EIS clearly lays out the potential mishap risk in the first seven paragraphs in Section BR3.4.1.2. The first sentence in this section says: The F-35A is a new aircraft and historical trends show that mishaps of all types decrease the longer an aircraft is operational as flight crews and maintenance personnel learn more about the aircraft's capabilities and limitations. In addition, the EIS indicates that the Air Force recommends that communities preclude residential or other inappropriate development in these zones. However, it is up to the communities to define and enact such measures. |
| SB1-7 (Bullet 7) | R0249, R0250, R0287, R0480, R0489 | When and where will fuel be dumped? | Base-specific Section BR3.4.1.2 was updated with further information about the emergency dumping of fuel and fuel jettison procedures. Fuel is released in liquid form, most commonly at higher altitudes where it dissipates over unoccupied areas. Additional information was included in these sections referencing USEPA's determination of "no serious effect" from emergency fuel dumping. In 2001 the USEPA National Vehicle and Fuel Emissions Laboratory concluded: "Since fuel dumping is a rare event, and the fuel would likely be dispersed over a very large area, we believe its impact to the environment would not be serious" (USEPA 2001). |
| SB1-8 (Bullet 8) | R0249, R0250, R0287 | Effect of fuel on drinking water supply. | Section BR3.5 indicates that no water or soil contamination is expected and Section BR3.15 indicates that the use of toxic materials would decrease or be eliminated with the basing of the F-35A. Emissions from the F-35A would generally decrease when compared to baseline conditions and therefore, would have no effect on drinking water supply. |

South Burlington City Council (2-Members)-SB

| Response Number | Comment Number | Comment Description | Response |
|--------------------|---------------------|--|---|
| SB1-9 (Bullet 9) | R0249, R0250, R0287 | Has the Air Force informed the FAA of their erroneous noise data? | The EIS correctly addresses noise. The NOISEMAP noise model takes into consideration the propagation of noise through the air, and the effects of whether it is traveling over hard (water) or soft (ground) surfaces. The fact that the noise levels received by any one individual change on a daily basis because of weather conditions (humidity, temperature, wind, cloud cover, etc.) requires the analysis to use a metric that cumulatively averages noise over time, which is why modeling has to be used rather than simply using individual noise levels as measured on a single day or single, instant. NOISEMAP validation is covered in the following documents but it is not customary to reiterate the validation results in every report that uses NMAP. "Field Studies of the Air Force Procedures (NOISECHECK) for Measuring Community Noise Exposure from Aircraft Operations," AFAMRL-TR-82-12, by R. Lee. |
| SB1-10 (Bullet 10) | R0249, R0287, R0739 | Recourse the community has if the projected noise and safety assessments prove to be worse. | The Air Force is constantly upgrading information on aircraft noise levels for the F-35 through testing and measurement (which is the input to models). As the fielding of this new aircraft progresses, the Air Force will institute AICUZ or similar studies for the airfields. These offer the opportunity for community input. The Air Force takes safety very seriously and it forms part of daily operations. Should safety issues arise with the F-35, the Air Force will investigate and take appropriate action. In addition, the AICUZ process provides opportunities for public input. |
| SB1-11 (Bullet 11) | R0249, R0250, R0287 | What factors outweighed the costs to the population so that Burlington became the preferred alternative? | Chapter 2, Section 2.2.6 of the EIS notes that Burlington AGS and Hill AFB were selected as the preferred alternative locations because the Air Force determined that these locations best fulfill its mission responsibilities taking into consideration operational, technical, environmental, and other factors. Section 2.2 of the EIS outlines the Alternative Identification Process and Section 2.2.3 and notes that the mission criterion was weighted more heavily than capacity, environmental, and cost. Section 2.4 of the EIS discusses measures which could be implemented to avoid, minimize, or reduce potential environmental impacts for regions adversely impacted. |
| SB1-12 (Bullet 12) | R0249, R0250, R0287 | Health effects to children. | Classroom speech interference due to aircraft operations is presented in Section BR3.2.1.2 and specific information about noise effects on learning and cognitive abilities is presented in Appendix C, Section C2.5.5. In summary, there is no scientific basis for a claim that noise levels below 75 dB DNL would have potential health effects. |
| SB1-13 (Bullet 13) | R0249, R0250, R0287 | Loss of home values. | Appendix C at Section C2.7 cites research that indicates a correlation between noise and a decrease in property values. However, these studies note that property values are also affected more by factors other than noise. Hogan's study was not included in the evaluation because this other research refutes and supersedes his findings. |

South Burlington City Council (2-Members)-SB

| Response Number | Comment Number | Comment Description | Response |
|--------------------|---------------------|--|--|
| SB1-14 (Bullet 14) | R0249, R0250, R0287 | Loss of property taxes. | The EIS describes potential noise effects on property value in Appendix C, Section C2.7 and in BR3.11.1.2. Section C2.7 cites research that indicates a correlation between noise and a decrease in property values. However, these studies note that property values are also affected more by factors other than noise. |
| SB1-15 (Bullet 15) | R0249, R0250, R0287 | Effect on tourism. | The EIS notes in Sections BR3.2 and BR3.10 that average noise levels and the number of overflights would change and be noticeable in some recreation areas. Some individuals who experience this increase in noise or overflights may be annoyed and this could interfere with the quality of their recreation; however, the F-35A would be conducting activities similar to those the F-16 currently do, activities under which tourism-based businesses are able to operate. |
| SB1-16 (Bullet 16) | R0249, R0250, R0287 | Noise effects on the health of residents. | Noise effects on the health of residents are provided both in Section BR3.2.1.2 and Appendix C, Section C2.5. |
| SB1-17 (Bullet 17) | R0249, R0250, R0287 | Effects of land being exposed to DNL above 65 dB. | Effects to land uses by noise is evaluated and presented in Section BR3.10: Land Uses. BR3.10.1.2 provides the results of this evaluation. |
| SB1-18 (Bullet 18) | R0249, R0250, R0287 | Noise effects on learning and cognitive abilities. | Noise effects on learning and cognitive abilities is presented in Appendix C, specifically at Section C2.5.5. See also response to NO-12. |
| SB1-19 (Bullet 19) | R0249, R0250, R0287 | Significance of locations near the airport being at or above 65 dB DNL. | Magnitude of effects to areas exposed to noise levels 65 dB DNL and greater is thoroughly analyzed in Section BR3.2.1.2 |
| SB1-20 (Bullet 20) | R0249, R0250, R0287 | Whether mission profiles, training, and maintenance changes would result in different flight times and patterns. | As presented in Chapter 2, Section 2.2.1 as well as BR2.1.2, mission profiles, training curricula, and maintenance/ground support operations were all taken into consideration within the current EIS. There would be no negligible changes to the current flight times and patterns flown at and around Burlington airport. |
| SB1-21 (Bullet 21) | R0249, R0250, R0287 | How competing requirements for fresh water, power, and other natural resources would be handled. | Irreversible and irretrievable commitment of resources was evaluated at Section BR4.2; however, these are not reasonably foreseeable conditions. |
| SB1-22 (Bullet 22) | R0249, R0250, R0287 | Strategies for dealing with drought conditions and a scarcity of fossil fuels. | Irreversible and irretrievable commitment of resources was evaluated at Section BR4.2; however, these are not reasonably foreseeable conditions. |